

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Parts 0, 1, 2, and 15 of the	)	
Commission's Rules regarding Authorization	)	ET Docket No. 13-44
of Radiofrequency Equipment	)	RM-11652
	)	
Amendment of Part 68 regarding Approval of	)	
Terminal Equipment by Telecommunications	)	
Certification Bodies	)	

**Reply Comments of the Information Technology Industry Council**

The Information Technology Industry Council (ITI) is pleased to provide the following reply comments on ET Docket No. 13-44, RM11652. In particular, ITI would like to respond to comments filed by the American National Standards Institute Accredited Standards Committee C63® that address ITI's prior comments on ANSI ASC C63's Petition related to this Rule Making.

**Item 1.** ANSI ASC 63® states that they intend to make changes to ANSI C63.4 in the 2013 edition which will address ITI's concerns with respect to the 2 dB rule and the need for further clarification on the use of hybrid antennas. While the work on the 2013 edition of C63.4 makes significant progress in these areas, the proposal in this Rule Making is to adopt the 2009 edition of ANSI C63.4. As ASC C63® has issued conflicting interpretations of ANSI C63.4-2009 with respect to the use of hybrid antennas (the most recent allowing their use, although seemingly grudgingly) our concern with the adoption of ANSI C63.4-2009 for this reason remains.

**Item 2.** This item addresses the same basic concerns as item 1 above and we have the same concerns with respect to the use of ANSI C63.4-2009.

**Item 3.** We maintain our opposition to the use of undated references in normative standards, regardless of the authorship of the referenced documents. Using undated references places an unnecessary burden on the user of the standard as the user must continually check all the undated reference documents to ensure that the correct (latest) version is available and in use in the laboratory. This is not a productive use of laboratory personnel and wastes resources. Dated references should be used for all normative references in a standard.

**Item 4.** We appreciate the change in position of ASC C63® in this matter and agree with their revised position that interpretations not be considered normative.

**Item 5.** We agree that a statement by the FCC in the Rules that the use of hybrid antennas is allowed should resolve the uncertainty in this area due to the lack of expressed acceptance of their use in ANSI C63.4-2009 and support the suggestion by ASC C63® that this statement be added. We maintain our concern with the wording on the 2 dB rule in ANSI C63.4-2009 and look forward to an improved version when the 2013 revision to ANSI C63.4 is published.

Thank you for your consideration of these reply comments. ITI is committed to working together with the Commission and other stakeholders on this important issue.

### **About ITI**

The Information Technology Industry Council represents the leading providers of information technology (IT) products and services. ITI is the voice of the high tech community, advocating policies that advance industry leadership in technology and innovation; open access to new and emerging markets; promote e-commerce expansion; protect consumer choice; and enhance the global competitiveness of its member companies. For more information visit: [www.itic.org](http://www.itic.org)